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August 3, 2020

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges (See Commission Order No. 2020-313) **Docket No. 2020-125-E**

Dear Ms. Boyd:

On July 24, 2020, counsel for Dominion Energy South Carolina Incorporated ("DESC") filed a letter informing the Public Service Commission of South Carolina ("Commission") that DESC would not be filing any quarterly rate of return reports for its retail electric operations beginning June 30, 2020, and during the pendency of Commission Docket No. 2020-125-E. These quarterly reports provide valuable information and updates to the public and the South Carolina Office of Regulatory Staff ("ORS"). Accordingly, ORS respectfully requests that the Commission continue to require DESC to file its quarterly rate of return reports.

The Commission has required that DESC¹ file quarterly reports on its rate of return since at least 1974 (See Commission Order No. 17,648).² The quarterly reports provide relevant and important information in a well-established format. In its letter, DESC fails to present a sufficient justification for providing fewer updates to ORS, the Commission, and the public at a time when DESC has announced it will be filing an Application for a rate increase ("Application"). While DESC broadly asserts that its Application will contain information typically included within the

¹ In 2019 the SCANA Corporation, of which South Carolina Electric & Gas Company was a subsidiary, merged with and was acquired by Dominion Energy Inc., of which Dominion Energy South Carolina, Inc. is an indirect subsidiary.

² Commission Order No. 17,648 requires that the Company file with the Commission quarterly reports showing: Rate of Return of Approved Rate Base; Return on Common Equity (allocated to retail electric and gas); Earnings per share of Common Stock; and Debt coverage ratio of earnings to Fixed charges.

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Company's quarterly reports, that claim serves to confirm that DESC will suffer no significant prejudice if it were required to continue filing its regular quarterly reports. On the contrary, if DESC were excused by the Commission from filing these quarterly reports, there is great risk of prejudice on at least two accounts: 1) the chance that information typically included in the quarterly reports were excluded from the Application; and 2) the fact that parties reliant upon the quarterly reports would lose a valuable tool used to navigate and review a complex rate application and consequently may miss otherwise apparent data.

The ORS utilizes these quarterly reports because they provide valuable and timely updates and relevant information. Accordingly, ORS respectfully requests that the Commission continue to require DESC to file its quarterly reports consistent with the format used in recently filed quarterly reports.

Sincerely,

s/ Andrew M. Bateman

Andrew M. Bateman

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)